

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In Re:	§	
	§	
DEEP MARINE HOLDINGS, INC.,	§	Case No. 09-39313
et al.	§	
	§	Jointly Administered
Debtors.	§	Chapter 11

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**DEBTORS' EXPEDITED MOTION TO EXTEND TIME FOR THE DEBTORS TO FILE  
NOTICES OF REMOVAL UNDER FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 9027**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON FEBRUARY 18, 2010 AT 3:00 P.M. IN COURTROOM 404, 515 RUSK, HOUSTON, TEXAS 77002. IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING, SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-THREE DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. IN ADDITION TO FILING YOUR RESPONSE WITH THE CLERK, YOU MUST GIVE A COPY OF YOUR RESPONSE TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors-in-possession (together, the "Debtors"), by and through their undersigned attorneys, file this Expedited Motion to Extend Time for the Debtors to File Notices of Removal Under Federal Rule of Bankruptcy Procedure 9027 (the "Motion").

In support of this Motion, the Debtors respectfully represent as follows:

## **I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over these cases and this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

## **II. BACKGROUND<sup>1</sup>**

2. On December 4, 2009 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11, Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court"). Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors are operating their businesses and managing their property as debtors-in-possession. Joint administration of the cases was granted by Court order on December 8, 2009. No trustees or examiners have been appointed in these cases.

3. The Court entered its Order Granting Chapter 11 Complex Case Treatment on January 5, 2010 (Doc. No. 107).

4. An official committee of unsecured creditors (the "Committee") was appointed in these cases on December 15, 2009. The Committee requested the appointment of a chief restructuring officer, and on January 7, 2010, this Court entered an order appointing John Bittner of Grant Thornton to serve as Chief Restructuring Officer ("CRO") for the Debtors.

## **III. RELIEF REQUESTED**

5. Under Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules") 9027(a), with respect to those claims or causes of action in a civil action pending when a case under the Bankruptcy Code is commenced, a notice of removal may be filed only within the longest of (A)

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<sup>1</sup> A more complete background of the Debtors' businesses and the events leading to the filing of these cases is provided in the Affidavit of John Hudgens in Support of First Day Motions (Doc. No. 41).

90 days after the order for relief in the case under the Bankruptcy Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the Bankruptcy Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief. If a claim or cause of action is asserted in another court after the commencement of a case under the Bankruptcy Code, a notice of removal may be filed only within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.

6. The Debtors seek an order, pursuant to Bankruptcy Rule 9006, to extend the time for filing notices of removal under any provision of Rule 9027 from March 4, 2010 until May 3, 2010. The Debtors' bankruptcy cases involve complicated issues, and the Debtors have devoted significant time and resources to filing their statements and schedules, filing and prosecution of the first day motions, finalizing the details of post-petition financing, negotiating the appointment of a chief restructuring officer, prosecuting the adversary proceeding related to the Delaware Causes of Action, and pursuing numerous initial business matters related to the early stages of these complex chapter 11 cases (including initial contact with the market to determine interest in asset sales and/or plan sponsorship). As a result of these events, the Debtors request an extension to better evaluate the scope of any pending litigation, to consider how such litigation may affect the Debtors, and to determine whether removing the litigation would be proper and more beneficial to the reorganization. Additional time is necessary for this examination to proceed and to carefully consider the need for removal of pending or recently initiated matters.

**IV. ARGUMENT AND AUTHORITY**

7. Bankruptcy Rule 9006(b)(1) provides in relevant part that "when an act is required or allowed to be done at or within a specified period by [the Bankruptcy Rules] or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order . . ." FED. R. BANKR. P. 9006(b)(1). Considered together with Rule 9027, Bankruptcy Rule 9006 provides authority to enlarge the time period for removing actions arising under the Bankruptcy Code. *See, e.g., Caperton v. A.T. Massey Coal Co.*, 251 B.R. 322, 325 (S.D.W.V. 2000) (finding that Rule 9006 permits extension of 30 day time period to remove under Rule 9027). The Debtors file this Motion before the expiration of the period originally prescribed in Rule 9027.

8. Cause exists because the Debtors need the additional time to properly assess the scope and strategies of any pending litigation and how such litigation may affect their reorganization. The Debtors are still at an early stage in their cases. Indeed, the Debtors have not formulated a plan or business restructuring at this time, but have the exclusive period of 120 days from the Petition Date to formulate and file a plan of reorganization.

9. Due to the Debtors not having finalized many important issues related to their restructuring, including their reorganization plan, it makes little sense, in the short time frame prescribed by Rule 9027, to force the Debtors to make decisions, such as determining whether to file notices of removal of any outstanding litigation, which may have an effect on their ability to effectively reorganize.

**VI. CONCLUSION**

WHEREFORE, premises considered, the Debtors respectfully request that the Court grant the relief requested herein and enter an order substantially in the form attached hereto, and grant the Debtors such other and further relief as the Court deems just.

Respectfully submitted,

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By: /s/ Jason G. Cohen

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on February 11, 2010, a true and correct copy of this document was served on all parties on the attached master service list by electronic means as listed on the court's ECF noticing system, by electronic mail as indicated, and/or by United States first class mail, postage prepaid.

/s/ Jason G. Cohen  
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